COVID-19

Prevention and Response in Public Accommodations

Example Standard Operating Procedure
(as required by SB 4 & NAC447 E)
Facility COVID-19 Prevention and Response: Standard Operating Procedure (SOP)

PURPOSE

In accordance with NAC 447 E, this SOP outlines procedures used by this public accommodation facility to establish minimum standards for prevention and response to SARS-CoV-2, the virus that causes COVID-19. This SOP applies only during the declaration of an emergency due to SARS-CoV-2 and during other periods in which conditions concerning the prevalence of SARS-CoV-2 exist. Items that are labelled “Recommended Best Practices” are not required and will not be enforced by the Southern Nevada Health District (SNHD) or other regulatory agencies but are intended only to give possible examples for employers to develop their own plans.

Employees in the following job categories need to know the information in this procedure and which things they will do as part of their jobs: Risk Management and/or Health and Safety Managers, Security, Management (acting as the “responsible person” required by the Health Authority), Housekeeping, Custodial Services/Environmental, and any others tasked by the Management to engage in COVID-19 prevention related activities.

Because of the following laws and regulations, the Health Authority requires a written SOP be followed by employees at your facility: Southern Nevada Health District Regulations Governing the Sanitation and Safety of Public Accommodation Facilities, 2006 and Nevada Revised Statute (NRS) and Nevada Administrative Code (NAC) 447, Public Accommodations.

In addition to the procedures outlined in this SOP, this facility will comply with all COVID-19 prevention guidelines as determined by the Nevada State Governor.

RESPONSIBILITIES

Management is the responsible person(s) at the Public Accommodation facility for the purposes of this SOP. Management is responsible for keeping this SOP current and in a user-friendly format that can be understood by all employees. It is their job to make a copy of the SOP adopted by the facility available to the Health Authority so that they can read it and comment on it. Management will also coordinate in order to reduce the SARS-CoV-2 transmission to the public and employees. If Management has concerns about how SARS-CoV-2 prevention is being handled, they will talk to Risk Management about those concerns. Risk Management can address the concerns by making changes to this procedure, if needed. Management will also make sure that all staff members responding to SARS-CoV-2 prevention measures are trained to do the work listed in this SOP and on Standard Precautions used to protect themselves from getting sick because of their work duties. Management must maintain written documents showing that staff has been well trained to do the work involved with SARS-CoV-2 prevention and response. For worker health and safety, Management will ensure that in-house staff have, and use, proper personal protective equipment (PPE) while working in the Public Accommodations facility. They will have enough trained staff on duty to adequately reduce and prevent to transmission of
SARS-CoV-2. Management must be available to employees to answer employee health and safety questions regarding their required roles in following this procedure.

**DEFINITIONS**

**Bedding** means mattresses, quilts, blankets, sheets, pillows, comforters and spreads.

**CDC** means the Centers for Disease Control and Prevention of the United States Department of Health and Human Services.

**Clean** means free of visible dirt, dust, sludge, foam, slime (including algae and fungi), rust, scale, mineral deposits, accumulation of impurities, and/or other foreign material.

**Cleaning product** means an article intended by the manufacturer to be used alone or in combination with other products to physically remove dirt, filth, and other contaminants or to otherwise render pathogens non-infectious. This term includes soaps, detergents, degreasers, abrasives, acids, disinfectants, and sanitizers.

**Close contact** has the meaning currently ascribed to it by the CDC for the purpose of determining when a person has been in close contact with another person who has tested positive for SARS-CoV-2.

**Coronavirus disease 2019** or **COVID-19** means

1. The novel coronavirus identified as SARS-CoV-2;
2. Any mutation of the novel coronavirus identified as SARS-CoV-2; or
3. A disease or health condition caused by the novel coronavirus identified as SARS-CoV-2.

**Employee** means any natural person in the service of an employer operating a public accommodation facility who provides such service under any appointment or contract of hire or apprenticeship, express or implied, oral or written, whether lawfully or unlawfully employed.

**Furniture** is the movable articles in a guest room or public area that make it fit for living or working. Furniture includes but is not limited to, tables, chairs, bed headboards, bed frames, box frames, sofas, carpets, curtains, pictures, vases, mirrors, televisions and other electrical equipment, and appliances. Bedding, utensils, and tableware are NOT considered to be furniture.

**Guest** is any person other than employees, either paying or non-paying, that uses any part of a public accommodation facility.

**Guest Room** is any sleeping or resting rooms or areas and contiguous areas such as bathrooms, kitchens, kitchenettes, etc., intended for private use by a guest or guests of a public accommodation facility.
**Health Authority** means the officers and agents of the Southern Nevada District Board of Health and the Southern Nevada Health District.

**Public Accommodation Facility** is a hotel/casino, resort, hotel, motel, hostel, bed and breakfast facility, or other facility offering rooms or areas to the public for monetary compensation or other financial consideration on an hourly, daily, or weekly basis.

**Personal Protective Equipment (PPE)** is any equipment or device designed to prevent occupational exposure of persons to harmful atmospheres or substances.

**Public area** is any area open to public view, whether indoors or outdoors, excluding guest rooms, at a public accommodation facility to which the public has approved access.

**Resort hotel** means any building or group of buildings that is maintained as and held out to the public to be a hotel where sleeping accommodations are furnished to the transient public and that has:

1. In a county whose population:
   a. Is 700,000 or more, more than 200 rooms available for sleeping accommodations; or
   b. Is 100,000 or more and less than 700,000, more than 300 rooms available for sleeping accommodations;

2. At least one bar with permanent seating capacity for more than 30 patrons that serves alcoholic beverages sold by the drink for consumption on the premises;

3. At least one restaurant with permanent seating capacity for more than 60 patrons that is open to the public 24 hours each day and 7 days each week; and

4. A gaming area within the building or group of buildings.

**Responsible person** is the person or persons who owns, manages, leases, acts as the primary point of contact or otherwise controls the construction, remodeling, operation, or maintenance of a public accommodation facility.

**Sanitized** means the treatment of equipment, utensils, and surfaces that can be accessed by the public with a biocide by a process which has been approved by the Health Authority as being effective in destroying pathogenic microorganisms of public health concern.

**GENERAL**

Cleaning products registered under [EPA List N](https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19) as effective against COVID-19 will be used throughout the facility. Employees will follow the directions on the label for use, including contact time, to ensure safe and effective use of the products. Find appropriate products on the EPA website: [www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19](https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19)
All existing SOPs and protocols for general cleaning will be internally reviewed to ensure that they are consistent with these guidelines.

SOPs and protocols will be properly implemented by staff through observation and training.

All employees will frequently be reminded of the need for handwashing and provided with instructions on proper handwashing.

Employee hand washing vigilance will be maintained through active management reminders and correction.

Employees are provided access to a sink with soap and water for handwashing or hand sanitizing stations containing 60% alcohol hand sanitizer will be installed within reasonable proximity to the employee’s work area.

**Recommended best practice** is to install hand sanitizing stations containing 60% alcohol hand sanitizer in dining facilities and restaurants, restrooms, break areas, employee meeting areas, front desks, bell desks, lobbies and principal facility entrances, and on the casino floor. Use of the stations will be encouraged.

**Recommended best practice** is to install COVID-19 prevention reminders in all restrooms and throughout the facility about the need for proper hand washing, social distancing and wearing face coverings.

To the extent reasonably possible, the following are encouraged:

1. Employees to remain at least 6 feet apart from other employees and guests during their work and while on break; and,

2. Guests to remain at least 6 feet apart from employees and other guests

The following are to be posted at each employee entrance and on each bulletin board where the facility regularly posts official communications with employees:

1. A one-page summary of the COVID-19 prevention standards

2. A list of key contact persons at public health agencies.

**FACILITY WIDE CLEAN UP AND SANITIZING**

Cleaning products registered under EPA List N as effective against COVID-19 will be used. Employees will follow the directions on the label for use, including contact time, to ensure safe and effective use of the products. Find appropriate products on the EPA website: [www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19](http://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19)
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The frequency of cleaning and sanitizing and disinfecting areas to reduce the transmission of SARS-CoV-2 will be increased throughout all areas of the facility to ensure it is done regularly throughout the day.

The following items in guest rooms will be cleaned every day that the room is in use, unless the guest using the room declines in-room housekeeping: Desks, tabletops, minibars that have been used after the most recent cleaning, interior and exterior handles of doors, faucets, toilets, nonporous headboards of beds, light switches, remote controls, telephones, keyboards, touch screens, bed linens, towels, bed scarves and other decorative items on beds.

The public accommodation facility will not advise or incentivize guests to decline daily in-room housekeeping.

The following high-contact areas and items in locations used by the public and employees will be cleaned regularly throughout the day while in use:

1. Fixtures with which guests and employees may be expected to have regular physical contact;

2. Doors and door handles at exterior entrances;

3. Door handles at interior entrances regularly accessed by guests and employees;

4. Regularly used computer keyboards, touch screens, credit card readers, printers, telephones, light switches, ice machines, vending machines and other frequently used instruments and equipment;

5. Countertops and desks in entrance areas and other high-usage areas;

6. Glass surfaces, desks, tabletops, door handles and light switches;

7. Counters, desks, touch screens, keyboards, credit card readers and desktops in front desk areas;

8. Elevator buttons and rails in guest and service elevators;

9. Sinks, faucets, walls, toilets, toilet paper dispensers and door handles in employee and public restrooms;

10. Work surfaces, tables, utensils, counters, touch screens and keyboards in areas used for food preparation;

11. Tables, desks, tabletops, door handles and light switches in shared offices, employee locker rooms and employee cafeterias;
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12. Exercise equipment, weights, tables, countertops, chairs, lockers and benches in fitness centers;
13. Tabletops in meeting rooms;
14. Touch screens and keyboards in bar and dining facilities.
15. Tables, bartops, menus and check presentation holders in bar and dining facilities to be cleaned and sanitized after use by a guest.

Key cards and other types of keys for accessing rooms will be cleaned before those key cards or other keys are issued to another guest or removed from circulation for at least 24 hours after a guest checks out.

Soiled laundry to be cleaned as necessary.

Laundry carts and hampers to be cleaned regularly throughout the day while in use.

Workstations will be structured and/or separated by space or physical barriers to allow social distancing where practical to the maximum extent recommended by the CDC.

ROUTINE GUEST ROOM CLEANING - RECOMMENDED BEST PRACTICES

Visibly dirty surfaces using will be cleaned using detergent, water and then disinfected with a registered disinfectant on EPA's List N. Employees will follow the directions on the label for use, including contact time, to ensure safe and effective use of the products.

Frequently touched surfaces will be routinely cleaned and disinfected, including tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.

All bed linens, pillow protectors, and towels will be changed upon guest checkout. Consider removing decorative pillows and other hard-to-clean items from guest rooms.

Electronics, such as tablets, touch screens, keyboards, remote controls, will be cleaned following the manufacturer’s instructions for cleaning and disinfecting.

CLEANING PROCEDURES FOR ROOMS WITH KNOWN ILL GUESTS – RECOMMENDED BEST PRACTICES

Facilities may opt to close off affected areas/rooms for a period of not less than seven days. Once that time has elapsed, it would not be necessary to deep clean/disinfect to these standards.

Areas used by suspected or confirmed COVID-19 cases will be closed off and staff will wait
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as long as practical (24 hours if feasible) before beginning cleaning and disinfection to minimize the potential for exposure to respiratory droplets. If possible, outside windows will be opened to increase air circulation in the area.

Once the suspected or confirmed COVID-19 case has checked out, the room will be considered as a “hot room” and deep cleaned to ensure that any SARS-CoV-2 contamination has been removed. Consideration should be given to having a specially trained team available for the cleaning of rooms with known ill guests.

All areas of the rooms with suspected or confirmed COVID-19 cases will be treated as if they are contaminated with a highly infectious organism.

Staff entering the room will wear appropriate personal protective equipment (PPE), including a disposable mask, gloves, eye shield, disposable shoe covers, and a plastic disposable apron.

All disposable paper products (e.g., tissues, toilet paper, cups, Keurig Cups, coffee filters) will be discarded.

All towels, linens, pillows, bedspreads, and blankets will be removed and carefully placed into separate laundry bags. They will be washed in hot water and completely dried. If an outside laundry is used, they will be advised that the laundry is potentially infectious.

Staff will disinfect high-touch areas such as taps, faucets, door and drawer handles, door latches, toilet or bath rails, telephones, rails on balconies, light and lamp switches, thermostats, remote controls, curtain pulls and wands, covers on guest information books, alarm clocks, hair dryers, irons, and pens.

Carpets contaminated with vomit or diarrhea will be cleaned in a three-step process, similar to norovirus prevention. First, carpets will be cleaned with carpet detergent and hot water. Second, carpets will be disinfected by applying an appropriate disinfectant. Finally, carpets should be steam cleaned (158°F for 5 minutes or 212°F for 1 minute will inactivate the virus).

Soft furnishings will be cleaned and disinfected with an appropriate cleaner.

**MONITORING REQUIREMENTS FOR EMPLOYEE ILLNESSES**

A designated responsible person(s) will oversee and ensure on-site compliance with this SARS-CoV-2 response plan.

Each employee who is known to have had close contact with a guest or another employee
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who has been diagnosed with COVID-19 will be notified not later than 24 hours or as soon as practicable after the employer learns of the diagnosis.

Employees will check in daily for contact-free temperature measurements and review questions to screen for exposure to SARS-CoV-2 at a designated area prior to starting work. It is a **recommended best practice** that screening questions, as found on SNHD’s website, be:

| 1. Do you have a new cough that you cannot attribute to another health condition? | YES / NO |
| 2. Do you have new shortness of breath that you cannot attribute to another health condition? | YES / NO |
| 3. Do you have a new fever (100.4°F or higher) or chills that you cannot attribute to another health condition? | YES / NO |
| 4. Do you have any of the following symptoms? | YES / NO |
| - Fatigue | - New loss of taste or smell |
| - Congestion or runny nose | - Headache |
| - Sore throat | - Muscle or body aches |
| - Diarrhea | - Nausea or vomiting |
| 5. Have you come into close contact (within 6 feet) with someone who has a laboratory-confirmed COVID-19 diagnosis in the past 14 days? | YES / NO |

Managers will look for obvious signs of employee illness including fever, cough, and shortness of breath.

Employees will be trained on ways to prevent and mitigate transmission of SARS-CoV-2. The facility must document and maintain records of training. Such records must be made available to the health authority upon request.

Masks and gloves will be distributed at no cost to the employee, based on public health concerns and in accordance with the requirements of the Nevada Occupational Safety and Health Administration of the Department of Business and Industry;

**REQUIRED EMPLOYEE TESTING**

Certain employees as described below are required to be tested for SARS-CoV-2. Such required testing for SARS-CoV-2 must be:

1. Provided at no cost to the employee; and
2. Performed on-site or at a testing facility selected by the public accommodation facility.

Each new employee and each employee returning to work for the first time after March 13, 2020 will undergo testing for SARS-CoV-2, if such testing is available.
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Each employee who has been notified by the facility of being in close contact with a guest or employee who has been diagnosed with COVID-19 will undergo testing for SARS-CoV-2 and will be provided leave to obtain a SARS-CoV-2 test and await results as required in the employee leave section below. Such required testing will be done every time such notification occurs.

Each employee who has reasonable belief or has been advised that they have been in close contact with a person who has tested positive for SARS-CoV-2 is required to undergo testing for SARS-CoV-2. In addition to any other leave to which such an employee is entitled, they will be provided leave in accordance with the employee leave section below for the first occurrence on which the employee gives the employer such notification.

Each employee who notifies their supervisor that they are experiencing symptoms of SARS-CoV-2 is required to undergo testing for SARS-CoV-2 and must not return to work while awaiting the results of the testing. In addition to any other leave to which such an employee is entitled, they will be provided leave in accordance with the employee leave section below for the first occurrence on which the employee gives the employer such notification.

An employee who is tested pursuant to this section will authorize the provision of or provide the testing results to the public accommodation facility.

The confidentiality of information pertaining to employees and guests who test positive for SARS-CoV-2 or who are diagnosed with COVID-19 will be maintained:

1. Unless the employee or guest agrees otherwise; or
2. Be disclosed to the health authority as required for purposes of contract tracing or cleaning.

EMPLOYEE LEAVE

Employees who test positive for SARS-CoV-2 or is otherwise diagnosed with COVID-19 will follow CDC-recommended guidance. Such employees will not return to work until the criteria to discontinue home isolation are met.

The employee required to be tested as described above will be given, in addition to any other leave to which they are entitled:

1. Not more than 3 days of paid time off to await testing and testing results; and,
2. Additional paid time off if the public accommodation facility receives documentation of a delay in testing or receiving testing results that exceeds 3 days.
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Except as otherwise provided each employee who tests positive for SARS-CoV-2 or is otherwise diagnosed with COVID-19 and is working or has been recalled to work at the time of the result or diagnosis will be allowed to take at least 14 days off, at least 10 of which will be paid time off.

Paid time off will be calculated at the base rate of pay for the employee. Paid time off pursuant to this section:

1. Will not be deducted from paid time off provided to the employee pursuant to NRS 608.0197 or a policy or contract of the public accommodation facility.

2. May be deducted from paid sick leave provided pursuant to Section 5102(a)(1)-(3) of the Families First Coronavirus Response Act, P.L. 116-127.

MANAGING GUESTS DURING OUTBREAKS OF SARS-CoV-2

Any guest who reports testing positive for SARS-CoV-2 or being diagnosed with COVID-19 will be requested to leave the public accommodation facility if practicable and seek medical attention.

Recommended best practice is to provide the following information to guests through signs:

1. The symptoms and transmission of COVID-19;
2. Prevention of COVID-19, including proper handwashing, social distancing, and mask wearing;
3. The procedure for reporting illness to the hotel and or health district;
4. How to obtain medical assistance, if necessary

COVID-19 RESOURCES

Southern Nevada Health District: www.snhd.info/covid


Environmental Protection Agency: www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19